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MOTOROLA SOLUTIONS, INC.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

EON CORP. IP HOLDINGS, LLC.

Plaintiff,

V.

SENSUS USA INC. et al.

Defendants.

Defendants.

Case No. C12-01011 JST (EDL)

**FOURTH JOINT STIPULATION TO
EXTEND DEADLINES RE EON CORP.
IP HOLDINGS, LLC'S MOTION TO
COMPEL MOTOROLA SOLUTIONS,
INC. TO PRODUCE DOCUMENTS AND
THINGS**

AND RELATED COUNTERCLAIMS



1 Plaintiff EON Corp. IP Holdings LLC ("EON") and Defendant Motorola Solutions Inc.
 2 ("MSI") hereby stipulate and agree as follows:

3 WHEREAS EON filed a Motion to Compel MSI to Produce Documents and Things (Dkt.
 4 No. 876) on November 26, 2013,

5 WHEREAS EON and MSI previously stipulated to extend the deadlines relating to EON's
 6 Motion to Compel pending finalization of settlement terms,

7 WHEREAS the Court granted EON and MSI's prior Stipulated Requests on December 10,
 8 2013 (Dkt. No. 890), January 14, 2014 (Dkt. 910), and February 11, 2014 (Dkt. 936),

9 WHEREAS MSI's Opposition to EON's Motion to Compel is currently due on March 11,
 10 2014,

11 WHEREAS EON's Reply in further support of its Motion to Compel is currently due on
 12 March 18, 2014,

13 WHEREAS the hearing for the Motion to Compel is currently scheduled for May 6, 2014
 14 at 2:00 p.m.,

15 WHEREAS EON and MSI reached a tentative settlement in principle during a conference
 16 with Magistrate Judge Spero,

17 WHEREAS EON and MSI are continuing to finalize settlement terms, and continue to
 18 agree in the interest of judicial economy and the preservation of time to extend the deadlines
 19 relating to EON's Motion to Compel pending finalization of settlement terms, after which this
 20 action will be dismissed as to MSI,

21 WHEREAS the Court has previously granted in part four Motions to Shorten Time relating
 22 to other Motions to Compel (Dkt. Nos. 802, 807, 814, 869), and granted three Stipulated Requests
 23 for an Extension of Time for Close of Fact Discovery and Expert Reports (Dkt. Nos. 872, 890,
 24 910, 966),

25 NOW, THEREFORE, the parties, by and through their respective counsel of record, hereby
 26 stipulate and respectfully request that the Court issue an order under Civil L.R. 6-2(a) postponing
 27 the briefing deadlines with respect to EON's Motion to Compel MSI to Produce Documents and
 28 Things (Dkt. No. 876), such that:



1 (1) MSI's Opposition to EON's pending Motion to Compel shall be filed no later than
2 April 11, 2014,

3 (2) EON's Reply in support of its Motion to Compel shall be filed no later than April
4 18, 2014, and

5 (3) The hearing for the Motion to Compel shall be remain scheduled on May 6, 2014,
6 or any other day thereafter at the Court's convenience.

7 DATED: March 7, 2014 Respectfully submitted,

8 KILPATRICK TOWNSEND & STOCKTON LLP

10 By: /s/ Jessica L. Hannah
11 JESSICA L. HANNAH

12 Attorneys for Defendant
13 MOTOROLA SOLUTIONS, INC.

14 DATED: March 7, 2014 Respectfully submitted,

15 By: /s/ Chad Ennis
16 CHAD ENNIS

17 Attorneys for Plaintiff
18 EON Corp IP Holdings LLC

19 PURSUANT TO STIPULATION, IT IS SO ORDERED:

20
21 DATED: March 10, 2014

22 
23 Honorable Elizabeth D. Laporte
24 U.S.D.C. Magistrate Judge



CERTIFICATION PURSUANT TO L.R. 5-1(i)(3)

Pursuant to Local Rule 5-1(i)(3), I hereby certify that I have obtained the concurrence in the filing of this document from all the signatories for whom a signature is indicated by a “conformed” signature (/s/) within this e-filed document and I have on file records to support this concurrence for subsequent production for the Court if so ordered or for inspection upon request.

Executed on March 7, 2014, at San Francisco, California.

/s/ Jessica L. Hannah

JESSICA L. HANNAH

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